

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:14CR00246 AGF (NAB)
)	
THOMAS ANDERSON, et al.,)	
)	
Defendant.)	

GOVERNMENT’S MOTION FOR ADDITIONAL TIME
IN WHICH TO RESPOND TO DEFENDANT ANDERSON’S MOTION TO DISMISS
FOR IRREPARABLE DENIAL OF DEFENDANT’S CONSTITUTIONAL RIGHT TO
EFFECTIVE ASSISTANCE OF COUNSEL

COMES NOW the United States of America, by and through Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and John T Davis, Assistant United States Attorney for said District, and states as follows:

On April 9, 2015, defendant Anderson filed a sealed motion with this Court requesting dismissal of the indictment. A hearing on the motion was scheduled for May 14, 2015 and the Government was given until April 23, 2015 to file its response to the motion. Due to workload issues, the Government requires additional time, up to and including in which to formulate its response.

The undersigned has conferred with counsel for defendant Anderson who has no objection to this request.

WHEREFORE, the Government respectfully requests additional time up to and including **Tuesday, April 28, 2015** in which to file its response to defendant Anderson’s motion to dismiss indictment and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

/s/ John T Davis
JOHN T DAVIS #40915 MO
Assistant United States Attorney
111 South 10th Street, Room 20.333
St. Louis, Missouri 63102
(314) 539-2200

CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ John T Davis
JOHN T DAVIS #40915 MO
Assistant United States Attorney